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*Attorneys for the Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* ALL PAPERS SHALL BE FILED IN THE  
LEAD CASE, NO. 19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)  
(Jointly Administered)

**STIPULATION BETWEEN THE  
REORGANIZED DEBTORS AND  
CALPINE EXTENDING TIME TO  
RESPOND TO THE MOTION FOR  
ENTRY OF AN ORDER FURTHER  
EXTENDING DEADLINE FOR THE  
REORGANIZED DEBTORS TO OBJECT  
TO CLAIMS AND FOR RELATED  
RELIEF**

**Re: Dkt. No. 13745**

**[No Hearing Requested]**

1 This stipulation and agreement for order (“**Stipulation**”) is entered into by PG&E  
2 Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively,  
3 the “**Reorganized Debtors**”), on the one hand, and Calpine Corporation and its subsidiaries  
4 (collectively, “**Calpine**”), on the other hand. The Reorganized Debtors and Calpine are referred to  
5 in this Stipulation collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate  
6 and agree as follows:

7 **RECITALS**

8 A. On May 17, 2023, the Reorganized Debtors filed the *Motion for Entry of an Order*  
9 *Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related Relief*  
10 [Docket No. 13745] (the “**Motion to Extend**”), which is set for a hearing before the Court at  
11 10:00 a.m. on June 7, 2023. Any response or opposition to the Motion to Extend is due by 4:00 p.m.  
12 (Pacific Time) on May 31, 2023.

13 B. Counsel for Calpine has requested, and counsel for the Reorganized Debtors has  
14 agreed, that the time for Calpine to respond to the Motion to Extend be extended.

15 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
16 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
17 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
18 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
19 **THAT:**

20 1. The time for Calpine to file and serve any response or opposition to the Motion to  
21 Extend is extended through 4:00 p.m. (Pacific Time) on June 1, 2023.

22 [Signatures on next page]  
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1 Dated: May 31, 2023

2 WEIL, GOTSHAL & MANGES LLP  
3 KELLER & BENVENUTTI LLP

CARLSON, CALLADINE &  
PETERSON, LLP

4 /s/ Thomas B. Rupp  
5 Thomas B. Rupp

/s/ Colin C. Munro  
Colin C. Munro

6 *Attorneys for the Debtors*  
7 *and Reorganized Debtors*

*Attorney for Calpine*